



September 5, 2023

**VIA ECF**

ATTN: Hon. Paul G. Gardephe  
Daniel Patrick Moynihan United States Courthouse  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re:                Re:    Torres v. Unibud Restoration Corp. et al.  
                         Docket No. 22-cv-1191;  
                         Consent Letter Motion for Extension of Time to File Documents

Dear Judge Gardephe:

I am counsel for the plaintiff, Genesis Torres, in the above referenced matter and I am writing with consent of the remaining Defendants in this case, pursuant to Your Honor's Individual Rule I. D., to respectfully request an extension of 45 days for Plaintiff's deadline (from 10/5/23 to 11/20/23) to file her response to Defendants' pending motion for summary judgement, as well as for the corresponding deadline for Defendants' reply if any (from 10/12/23 to 11/26/23).

The reason for this request is that the undersigned currently is inundated with conducting numerous depositions, opposing a motion for summary judgement, and preparing for a trial scheduled to start on Nov. 1, 2023 in other cases. Defendants consent to this request and no other

currently scheduled dates or deadlines will be impacted by this request. This is the first such requested extension of these deadlines.

Plaintiff thanks the Court for its time and attention to this matter.

*Respectfully submitted,*

DEREK SMITH LAW GROUP, PLLC  
*Attorneys for Claimant*

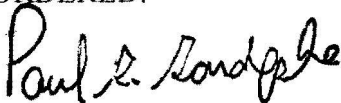


Seamus P. Barrett, Esq.

CC to all counsel of record via ECF

**MEMO ENDORSED:** Plaintiff's opposition is due **November 20, 2023**. Defendants' reply, if any, is due **November 26, 2023**.

SO ORDERED.



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Paul G. Gardephe  
United States District Judge  
Date: October 6, 2023